



## **Remarks**

In compliance with 714.16 the following reasons are provided for further consideration of these amendments under 37 CFR 1.312.

(A) Amendment to claim one is needed for proper protection of the invention and requires no substantial amount of work on the part of the Office.

(B) The proposed amended claims require no additional search or examination since the new claim is simply a previously withdrawn one. It was amended to be included in claim one in the previous attempt to convince the examiner of the uniqueness, nonobviousness, and novelty of the invention. Applicant believes the examiner's amendment of claim one sufficiently defines the invention in the structural clause, and further restriction by the functional clause is especially restrictive, particularly since it does not adequately describe the invention's function, as further study of it has shown.

(C) Claim one is patentable based solely on the structural clause since it sufficiently describes the differences from the prior art. The new (previously withdrawn) claim 13 is still patentable since it is dependent on claim one.

(D) This is the first response to the examiner's amendments.

## **Comments:**

Examiner reasoned cancellation of claims 34, 35, 37, and 38 were necessary to bring the application into condition for allowance. Applicant respectfully disagrees with this contention under 1302.14(V) and opines the claims should be allowable as written since they are dependent on claim one, which was allowable.

## **Claims Amendments**

These amendments are to limit claim 1 to the structural features only. The functional clause is returned to a dependent claim. Another mode of manipulation has been found, without any structural changes. It has its own advantages functionally and esthetically compared to the previously described manipulation modes.

This new mode of manipulation is most similar to the tipping/fanning mode but is actually quite different. For example a jukebox or endless loop mode, which has been described previously in the tipping/fan mode, is easily done, and offers a different loading or viewing opportunity.

As with the other unique manipulation modes this new mode can be described in terms of the angular positions of the hinges as in paragraph 76 of the specification. The tipping/fan mode describes motion of the pouches about an axis parallel to the hinges of the pouch mouths or in the coupling portion. In this new mode the pouch mouths travel in a circular motion, in a plane whose axis is perpendicular to the hinges, the axis being at the inner edge of the pouch mouth. The pouches essentially pivot along their side edges into a circle. Thus when the chain is completely opened in this display the hinges on the outer perimeter of the circle are open as in a fan display, however the hinges along the inner axis of the circle of rotation are coincidentally in a closed mode. Thus it is a unique mode with parameters uniquely recognizable by machine. It is particularly well suited for the jukebox or endless loop configuration.

The finding of this new manipulation mode or configuration is not surprising and others are certainly conceivable. For example bottom openings on the pouches combined with sealed or open tops of the pouches would provide other functional modes with unique characteristics and uses, which have not been previously claimed or even described. They all however are still dependent on claim 1. It simply illustrates the uniqueness and versatility of the invention as a system, which will likely evolve functionally over time, but

still be dependent on the structural nature of amended claim 1.

This is not an attempt to add new matter. It is simply to illustrate the incomplete and evolving functional definitions associated with this invention. Any functionally limiting clause with only currently defined modes would be excessively limiting in an independent claim, over time. Therefore the functional clause, which includes currently known manipulation modes, previously was previously withdrawn. It is currently returned to dependent claim 13.

Claim 11 is modified according to what the applicant interprets Examiner's Amendment to claim 11 to be in the Notice of Allowability, paragraph 8.

Claim 13 is presented as withdrawn-currently amended to return the functional clause from claim 1 to a dependent status.

Claim 14 is shown with Examiner's amendment and to include the phrase "or more" in specifying the number of pouches.

### **Drawing Amendments**

Drawings are provided as one replacement sheet for Fig. 1 and 9 new drawings as required by the Examiner in the previous Office Actions.

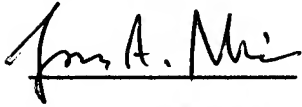
### **Specification Amendments**

The abstract is currently amended from the examiners entry of paragraph {150}. Since "The abstract should describe the disclosure sufficiently to assist readers in deciding whether there is a need for consulting the full patent text for details", the abstract is amended to include recently entered partial text from paragraph [150] which succinctly summarizes applicability of the product, while previously the abstract was too general in describing structure and functional modes without uses.

**Conclusion**

The Office or Examiner is invited to contact the Applicant if there are any concerns regarding the subject application.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonas A. Navickas", written over a horizontal line.

JONAS A. NAVICKAS pro se Applicant

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